

PROPOSED/FINAL DETERMINATION

Kentucky Power Company (DBA American Electric Power) has applied to the Kentucky Division for Air Quality for a Title V permit to operate its Big Sandy Plant electric generating facility located on U.S. 23, six miles north of Louisa, Kentucky. The plant is a Title V source because potential emissions of criteria and hazardous air pollutants exceed the major source thresholds.

A preliminary determination was made to approve the permit and a public notice was placed in The Big Sandy News - on Wednesday, June 25, 1997. The comment period expired and comments were received from the source, the U.S. Environmental Protection Agency, and the Utility Information Exchange of Kentucky (UIEK). Responses to comments and permit changes associated with those comments are listed in Attachments D and E. Additionally, minor revisions have been made to the language of the permit to reflect changes made to the division's Title V permit template for clarity purposes only.

In conclusion, a thorough analysis has been made of all relevant information available which pertains to this application. The Division has concluded that the source should comply with all applicable air quality regulations and requirements. Compliance with the terms of the permit will ensure compliance with all air quality requirements. Therefore, it is recommended that the permit be issued as conditioned.

**KENTUCKY DIVISION FOR AIR QUALITY'S RESPONSE TO COMMENTS
RECEIVED FROM THE U.S. ENVIRONMENTAL PROTECTION AGENCY
FOR KENTUCKY POWER BIG SANDY PLANT TITLE V PERMIT
Facsimile dated July 30, 1997**

1. Comment #(1) Q1: Re: Page 1, Section A: Does the permit provide a definition of an "affected" facility?

Response to Comment #(1) Q1:

The Division for Air Quality (DAQ) will change affected facility to "emissions unit" which is defined in 401 KAR 50:035.

2. Comment #(1) Q2: Re: Page 1, Section A: Do the exceptions referred to here include minor modifications?

Response to Comment #(1) Q2:

Exceptions referred to in the permit do not include minor modifications. The exceptions referred to are those which are not required to be addressed for permitting under Kentucky regulations. Minor modifications/revisions require a submittal of a complete permit application based on 401 KAR 50:035, Section 15.

3. Comment #(1) Comment 1: Re: Page 1, Section A: We recommend that this section either be more specific regarding the exceptions or as to where one can locate the exceptions in the referenced regulation. In general, simply referencing Kentucky's Rules may in some cases, make the permit requirement ambiguous.

Response to Comment #(1) Comment 1: The Division for Air Quality acknowledges the comment but has referred to the particular regulation where the exceptions are mentioned. The Division did not reference the specific section of the regulation since that could change in a future version of the regulation.

4. Comment #(1) Comment 2: Re: Section G, General Conditions, subpart C, "Permit Revisions", condition 1; and Part 70.6(a)(8); and Part 70.6(a)(4)(I): We note that the Phase II Acid Rain permit does include an explanation that authorized changes in allowance allocations do not "necessitate a revision to the sulfur dioxide allowance allocation identified in this permit, but there does not appear to be a condition in the draft permit for Big Sandy that specifically indicates what is being stated in either 70.6(a)(8) or 70.6(a)(4)(I). Please clarify if Regulation 401 KAR 50:035, Section 15 covers these requirements.

Response to Comment #(1) Comment 2:

The DAQ regulation 401 KAR 50:035, Section 15 clearly specifies that a minor permit revision is not required for any changes which are allowed under the acid rain program. The condition in the permit is from, 40 CFR Part 70.7 (e)(2)(i)(B), as well as 401 KAR 50:035, Section 15(2) which indicates that: minor permit revision procedure may be used for permit revisions involving the use

of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the State Implementation Plan or in applicable requirements.

5. Comment #(2): In general, simply referencing a Kentucky Regulation, may in some cases, make the permit requirement(s) unclear or ambiguous. (In particular the opacity exemption for BSU1 and BSU2). Instead of referring to Kentucky regulation only, the permit would be more clear and enforceable if the requirements are spelled out in Section B, Subsection 2, condition 2(b) of the permit.

Response to Comment#(2):

To address this comment, the Division has revised the permit conditions 2(b) in Subsection 2 as follows: “b) Pursuant to 401 KAR 61:015 Section 4(4) and Regulation No. 7, emissions shall not exceed 40 percent opacity based on a six minute average except that a maximum of 60 percent opacity is allowed for a period or aggregate of periods not more than six minutes in any sixty minutes during building a new fire, cleaning the firebox, or blowing soot”.

6. Comment #(3): It would be helpful if the control equipment associated a particular unit were included in the description of the emission unit on the first page of Section B .

Response to Comment#(3) Comment 1:

The Division agrees with the comment and has revised the permit to include the control equipment under the description for BSU1 and BSU2.

7. Comment #(4) Q1: Re: Section B, “Continuous Compliance Demonstration Method”, Subsection 2, Condition 4 indicating CEM data may be used to demonstrate compliance with the sulfur dioxide allowable emissions standard, however, it indicates there needs to be prior approval by the Division. Why is it necessary for the permittee to obtain “prior approval”?

Response to Comment #(4) Q1:

The “continuous compliance demonstration method” sections have been removed from the draft permit. The “prior approval language” is also removed along with the “continuous compliance demonstration method” sections. Also, see subsection 4(a) and subsection 4(f).

Specific monitoring requirements for sulfur dioxide have been revised under subsections 4(a) and 4(f) on the permit for BSU1 and BSU2.

Also, see chronology of responses to UIEK comments.

8. Comment #(4) Comment 1: Re: Section B, Subsection 4, “Specific Monitoring Requirements”: It appears that it would be appropriate to consider the CEM data collected as the primary means of demonstrating compliance with the sulfur dioxide limit and that the coal analysis and sampling should be secondary (used during CEM down times). CEM’s are required by the Acid Rain Regulations and demonstrate compliance on a real time basis. CEM’s are considered superior to coal analysis for demonstrating compliance with short term sulfur dioxide standards.

Response to Comment #(4) Comment 1:

See subsections 4(a) and 4(f) for BSU1 and BSU2 and responses to UIEK comments.

9. Comment #(4) Comment 2: Using language in the permit which indicates “monitoring of operations for sulfur dioxide emissions shall be conducted by representative sampling and analysis of fuel to be burned, or by the use of unbiased data collected by the 40 CFR Part 75 continuous emission monitoring system” could be misunderstood by the source. Such language does not shield the source from violations of the applicable requirements established through other evidence nor does it relieve the source from the obligation to comply with the underlying emission limit or other applicable requirements being monitored. The preamble to EPA’s credible evidence rule specifically states that a permit cannot shield a source from enforcement based on evidence not specified in the permit (see 62 FR 8314, February 24, 1997, p8320).

Response to Comment #(4) Comment 2:

The Division acknowledges the comment but at the issuance of this permit, Kentucky has not adopted the credible evidence rule.

10. Comment #(4) Comment 3: Re: Section B, Subsection 3 “Testing Requirements” which requires the source to use EPA Reference Method 9 and the procedures in 40 CFR 60.11 to determine compliance with opacity requirement for truck dump unloading and coal conveying, processing, transfer points and handling operations. Once again, it should be understood that compliance with EPA Reference Method 9 does not shield the source from violations of applicable requirements established from other evidence not specified in the permit.

Response to Comment #(4) Comment 3:

The Division acknowledges the comment but at the issuance of this permit, Kentucky has not adopted the credible evidence rule.

11. Comment #(5) Q1: Re: Section B Subsection 2 (Continuing Compliance Demonstration Method), Condition #1: indicating methods of calculating the mass emission rate for particulate matter and. Q1 is Direct measurement? For demonstrating compliance with the PM allowable, are specific test methods being indicated (e.g. EPA Method 5 as indicated under the “Testing Requirements”) and how often?

Response to Comment #(5) Q1:

The continuing compliance demonstration method language has been removed from the permit. Direct measurement means stack testing with EPA Reference Method 5 or another EPA Reference method specifically specified and approved by Division Director.

See subsections 3 for Testing Requirements and subsections 4 for monitoring requirements and the responses to UIEK comments.

12. Comment #(5) Q2: Calculation? What is “accepted fuel data”?, What emission factors? -AP-42 or emission factors that have been previously approved by the permitting agency?, What is allowed for the control efficiency, is any parametric monitoring required to demonstrate that the control equipment is running properly?

Response to Comment #(5) Q2:

See subsections 4 for BSU1 and BSU2 and see chronology of responses to UIEK comments for monitoring requirements that may be used to assure compliance.

13. Comment #(5) Comment: The formulas referenced for calculating the emissions of particulate matter and sulfur dioxide should be included in the permit.

Response to Comment #(5) Comment:

See for BSU1 and BSU2 monitoring requirements for sulfur dioxide in subsections 4(a) and 4(f).

No formula is now required to estimate particulate matter emissions to demonstrate compliance with the allowable standard since the permittee may assure continuing compliance with the particulate emission standard according to subsection 4, condition (d) for BSU1 and BSU2. Also, please see chronology of responses to UIEK comments.

14. Comment #(6) Comment 1: Re: Section B, subsection 2, “Continuing Compliance Demonstration Method”, condition 2, which indicates that COM data may be used as an indicator of continuous compliance with the allowable particulate emission rate. Please clarify.

Response to Comment #(6) Comment 1:

The Division has decided to take out the cited condition of the permit. The permit has been revised accordingly.

15. Comment #(6) Comment 2: There does not appear to be a condition that states how the source is to demonstrate, on a continuous basis, their compliance with the applicable PM limit in the permit. Simply stating that compliance with the allowable particulate standard shall be demonstrated by direct measurement or calculated utilizing accepted fuel data, emission factor, and control efficiency information does not establish the frequency by which the source needs to demonstrate compliance, what parameters the source needs to monitor, what records need to be kept, etc. Performing Reference test Method 5 “within the term of the permit” does not appear to establish the parameters that may be used in demonstrating efficiency of the control equipment. It is unclear what the source is required to report to the Division every six months (Section F, Condition 5), with regards to monitoring their compliance with the PM limit. The applicable limit for PM, as it is indicated in the

draft permit does not appear to be practically enforceable.

Response to Comment #(6) Comment 2:

Regarding BSU1 and BSU2, the permit has been revised to mention the frequency of the stack test for particulate matter in subsections 3.

For particulate matter, periodic monitoring will be required as described in subsection 4(d) for BSU1 and BSU2.

Note that control efficiency information, accepted fuel data, and emission factor information are no longer referred to for BSU1 and BSU2 with regards to assuring compliance with the allowable particulate standard. However, proper operation of control equipment may be assured by the method outlined in the permit.

See chronology of responses to UIEK comments.

16. Comment #(7) Comment 1: Re: Section B, Subsection 2, Unit 4 (AUX2), “continuing compliance demonstration”, condition 2: This condition indicates that the source is required to demonstrate compliance by reading opacity during normal operation once in every quarter by use of EPA Reference Method 9. A demonstration once every quarter does not appear to be adequate. We recommend that the source be required to perform the necessary demonstration once per daylight shift. Please see the attached guidance issued by Region 7 regarding periodic monitoring for opacity.

Response to Comment #(7) Comment 1:

The Division agrees and the permit has been modified to include that requirement under Testing Requirements as follows:

“ When the unit is in normal operation, the permittee shall read, weather permitting, the opacity of emissions from the stack using Reference Method 9 once per daylight shift.”

17. Comment #(8) Q1: Re: Section B, Subsection 3 (“Testing Requirements), condition 3(b) cites testing requirements. The wording of this condition is not completely clear. Does this subsection require testing and only the timing of the testing is “upon approval by the Division”, or is testing not required except “upon approval by the Division”?

Response to Comment #(8) Q1:

The Division has rephrased the testing requirement to make the condition more understandable. “Upon approval by the Division” wording was included in the permit so that the permittee would submit a protocol for any stack test before actually conducting the test. This requirement has been included in the permit by adding the following General Condition on testing and protocol: Pursuant to Section VII 2.(1) of the policy manual of the Division for Air Quality as referenced by Regulation 401 KAR 50:016, Section 1.(1), at least one month prior to the date of the required performance test, the permittee shall complete and return a Compliance Test Protocol (Form DEP 6027) to the Division’s Frankfort Central Office. Pursuant to 401 KAR 50:045, Section 5, the Division shall be notified of the actual test date at least ten (10) days prior to the test.

18. Comment # (8) Comment 1: One particulate test in 5 years does not appear to be sufficient to demonstrate compliance. Since it appears that the efficiency of the control equipment is a factor in the source's demonstration of continuous compliance it may be necessary to require an initial performance test to establish the parameters to be monitored by the source in order to demonstrate that the control equipment is being operated in order to achieve the necessary efficiency (see comment 4 above). It may also be necessary to require the source to perform subsequent tests on an annual basis.

Response to Comment # (8) Comment 1:

The permittee is required per subsections 3 for BSU1 and BSU2 to test for particulates initially and a second time within the permit term. Please see revised subsections 3 for BSU1 and BSU2.

Also, see chronology of responses to UIEK comments.

19. Comment # (9): Re: Section B, Subsection 4, Condition 4(a): Condition 4(a) requires sampling and analysis of fuel to be burned, but it is not clear if this means daily testing or batch testing or some other type of testing. The sulfur dioxide emission limit indicated in the Section B, Subsection 2, condition (c) requires data on a 24 hour basis, coal samples would need to be taken in real time in order to comply with the "24 hour average" requirement. Please clarify.

Response to Comment # (9):

Specific monitoring requirements for sulfur dioxide have been revised under subsections 4(a) and 4(f) on the permit for BSU1 and BSU2.

See responses to UIEK comments.

20. Comment # (10): Re: Section B, Subsection "Continuing Compliance Demonstration Method", Condition 5, stating that "the permittee shall be deemed in compliance if less than two percent of the non-exempt six-minute average opacity values during any calendar quarter are in excess of the forty percent opacity limit". This statement should be deleted from the permit since it makes an enforcement policy a federally enforceable statement. Section G, "General Compliance Requirements", condition 16 should be deleted from the permit (see above explanation).

Response to Comment # (10):

The Division will **delete/remove** the statement " the permittee shall be deemed in compliance if less than two percent of the non-exempt six-minute average opacity values during any calendar quarter are in excess of the forty percent opacity limit".

The Division will **delete/remove** the General Condition #16.

21. Comment #(11): Condition 4(e) of Section B, “Specific Monitoring Requirements”, is acceptable but it should be understood that if KYDEP is going to review each period of downtime of the CEM quarterly data, then the CEP is no longer in effect with regards to downtime. Note the policy would still be in effect for noncompliance time. The CEP is only a screening mechanism to reduce work load and to flag the sources with potential violations. The policy reduces the workload for the State since it only requires a detailed evaluation of downtime if the downtime exceeds 2 percent of the total operating time. If KYDEP is committing to evaluating all the downtime, however, then obviously the screening mechanism is not needed. It would be unacceptable for KYDEP to do an initial screening determining which downtime was due to unavoidable circumstances and then compare the remaining downtime to the 2 percent standard in the CEP.

Response to Comment #(11):

Note that this condition has been moved to subsection 4(h).
The Division acknowledges the comment.

22. Comment #(12): Applicability with NSPS cannot be determined since no construction dates are given in the permit or any background information.

Response to Comment #(12):

The Division will provide the construction/installation commencement dates OR dates before which constructed before the applicable date of the regulation as appropriate under the description section for all emission units in the statement of basis as well as in the permit. The Division will address the non-applicability of the NSPS or any other probable regulations in the statement of basis.

23. Comment #(13) Q1: Is there an AUX1 boiler?

Response to Comment #(13) Q1:

The AUX1 boiler disclosed in the Big Sandy application has been retired and is currently being removed from the facility; There is not to be a replacement boiler; Please see the letter to Mr. Roger Cook dated June 30, 1997, received by the Permit Review Branch on July 2, 1997.

24. Comment #(14): Section F, “Monitoring, Record keeping, and Reporting Requirements, Condition 5: the permitting authority needs to define “prompt” or “promptly” (see 70.6(a)(3)(iii)(B)).

Response to Comment #(14):

The Division has revised Section F, Condition 6, and defines prompt/promptly as shown here:

- “6. a) In accordance with the provisions of Regulation 401 KAR 50:055, Section 1, the owner or operator shall notify the Division for Air Quality’s Ashland Regional Office concerning startups, shutdowns, or malfunctions as follows:
- i) When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
 - ii) When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall cause written notice upon request.
- b) In accordance with the provisions of Regulation 401 KAR 50:035, Section 7(1)(e)2, the owner or operator shall promptly report deviations from permit requirements including those attributed to upset conditions to the Division for Air Quality’s Ashland Regional Office. Prompt reporting shall be defined as quarterly for any deviation related to emission standards (other than emission exceedances covered by condition 6(a) above) and semi-annually for all other deviations from the permit requirements if not otherwise specified in the permit.”

25. Comment #(15): Part 70 requires the permitting authority to provide EPA and any other person who requests it, a statement that sets forth the legal and factual basis for the draft permit conditions. Items belonging to the statement of basis include: detailed descriptions of the facility, emissions units, control devices, and manufacturing processes, justification for streamlining of any applicable requirements, explanations for non-applicability determinations, notification to the source or the public about issues of concern. A statement of basis was not included in the permit review package submitted to EPA for review.

Response to Comment #(15):

The Division is including the statement of basis with the proposed permit. The Division will provide installation/construction dates for all emissions units on the Big Sandy permit and statement of basis so that EPA can understand why certain regulations do not apply. Division is responding to Comment #19 to explain about the coal handling throughput annual operating limitation and will discuss this in the statement of basis. Division explained in response to Comment #13 Q1 about the AUX 1 boiler.

For future draft permits the Division will be providing the statement of basis as requested.

26. Comment #16: The KY power plant burns pulverized coal in several indirect heat exchangers. Although there is currently no MACT standard regulating power plants, it is necessary for the permit to accurately calculate all HAP emissions, including fugitive emissions. In the emissions summary table, hydrogen chloride (2524 TPY) and hydrogen fluoride (316 TPY) are listed as the only two HAPs greater than 10/25 TPY. However, in the later calculations, chlorine is also included in the hydrogen chloride calculation for a total of 4755.6 TPY of chlorine/hydrogen chloride. We request clarification on this discrepancy since chlorine is also a HAP. Additionally, we ask for more background details on the derivation of the emission factor for chlorine/hydrogen chloride. Finally, there should be a similar calculation regarding the emissions of hydrogen fluoride, as it is listed in the emissions summary table as well.

Response to Comment #16:

The Division did not include chlorine in any calculations for HAPs. The Division showed hydrogen chloride and hydrogen fluoride emissions in the summary table because these were the only two hazardous air pollutants calculated to exceed 10 tons per year, based on AP-42 October 1996 factors for bituminous and subbituminous coal combustion. The Division does not understand the origination of the reference to chlorine emissions as the Division did not find any chlorine emission factors in the 10/96 AP-42 for chlorine from coal combustion. The Division performed emission calculations for hydrogen chloride and hydrogen fluoride based on AP-42 10/96 factors.

27. Comment #17: Re: Item 11, page 18. Routine maintenance, repair and replacement allows repair of electrostatic precipitators, replacement of bags in baghouses, and filters in filtration equipment. We assume the word “replacement” was misplaced in this condition and that the intent was to refer to the replacement of the bags in the baghouses and not the replacement of the electrostatic precipitator. Please clarify.

Response to Comment #17:

The Division concurs and will reword item 11 of the insignificant activities list (Section C) to state, “Repair of electrostatic precipitators, replacement of bags in baghouses, and filters in other air filtration equipment, to which Regulation 401 KAR 63:010 applies”.

28. Comment #18: Re: Section G - General Conditions, (d) Acid Rain Program Requirements: Condition 3 should be deleted.

Response to Comment #18:

The Division will **delete/remove** Condition 3 of Section G (d), Acid Rain Program Requirements.

29. Comment #(19) Comment 1: Section B, “Group Requirements”: Condition 1, “Operating Limitations”: It is unclear as to how the plant wide coal throughput limitation indicated here was determined and for what reason. After reviewing the construction permit issued in 1991 for the coal truck transfer, it still remains unclear how the limitation was determined and what information was used in the determination of the limit. Please explain.

Response to Comment #(19) Comment 1:

A minor source construction permit was issued for receiving coal via trucks with associated conveyors on April 2, 1991. The annual limitation of 5,824,000 tons per year was placed on the C-91-036; however, the Division has currently re-evaluated the limitations on C-91-036 and has determined that at continuous operation for the truck dump unloading and two conveyors (Unit 5 (point 05)) potential emissions uncontrolled are approximately nine (9) tons per year for particulate/particulate-10, based on standard coal handling emission factors, used by the Division's Minerals Section which are Midwest Research Institute - AP-42 approved - factors for eastern coal.

Therefore, the Division will remove the annual coal limitation and requirements under "Section B - Group Requirements" because the estimated particulate and particulate-10 uncontrolled potential emissions are less than net significant emission rates, for the truck dump unloading and conveying. The Division will thus leave the operating rate description of 2000 tons per hour for Unit 5, Truck dump and conveying.

Calculations and emission factors:

Truck unloading/receiving factor: 0.0004 lb PM/PM-10/ton.

Conveyors and transfer points factor: 0.0003 lb PM/PM-10/ton, each conveyor, and there are two conveyors.

Overall factor = $0.0004 + 0.0003 \times 2 = 0.001$

Lb/hr PM/PM-10 emissions = $0.001 \text{ lb/ton} \times 2000 \text{ tons/hr} \times \text{ton}/2000 \text{ lbs} \times 8760 \text{ hrs/year} =$
= 8.76 TPY PM/PM-10 uncontrolled.

30. Comment #(19) Comment 2: We note that the limit indicated in this condition (5,824,000 tons per year for any consecutive twelve month period) does not include the original limit (as indicated in the permit to construct) of 1000 tons per hour. This limit should be indicated in the permit.

Response to Comment #(19) Comment 2:

The Division has concluded, based on Comment 19 Comment 1 calculations disclosed directly above, that applicable permitting requirements are met given the operating rate of 2000 tons per hour instead of 1000 tons per hour. Note that the 1000 tons per hour rate disclosed on the 1991 construction permit was applicable only to the truck dump and conveying operations. Thus, the annual group limitation of 5,824,000 tons per year will be removed with the 2000 tons per hour throughput left under the description for operating rate for Unit 5.

The Unit 6 (point 06(03)) - coal unloading, crushing, conveying and handling - was installed in 1969 and was not permitted under the 1991 construction permit to which EPA is referring.

31. Comment #(19) Q1: Do these units have an applicable PM limit?

Response to Comment #(19) Q1:

See response #29 above, the response to Comment #(19) Comment 1.

The Division has revised the permit to include dates on or before which construction commenced to indicate applicability/non-applicability of Subpart Y. Note, the coal handling operations emissions units do not have an applicable PM limit because emissions are regulated by the fugitive

dust Regulation 401 KAR 63:010 (Unit 6), and by 40 CFR 60 Subpart Y (Unit 5) with a twenty percent opacity limitation, the applicable limit.

32. Comment #(19) Q2: Does unit 6 have an opacity limit?

Response to Comment #(19) Q2:

Unit 6, unloading, crushing, and conveying operations (with rotary dumper) does not have an opacity limit because the equipment was installed in 1969 well before the Subpart Y applicability date. Also, this equipment is not vented to a stack or a control device, although there are control measures like use of dust suppressant, enclosure, use of water spray; thus, the Division Regulation 401 KAR 61:020 which has an opacity limitation does not apply in this case, since the emissions are fugitive and not from a control device (i.e. baghouse, cyclone) or stack. Thus, the applicable requirements for Unit 6 are disclosed based on Regulation 401 KAR 63:010, Fugitive emissions.

33. Comment #(19) Comment 3: It is unclear on which emission points the source is required to perform the EPA Reference Method 9.

Response to Comment #(19) Comment 3:

The Division has removed the group requirements. EPA reference method 9 is listed under testing requirements, Subsection 3 for the Truck Dump operation, Unit 5, because Subpart Y applies. EPA Reference Method 9 is not listed for Unit 6 as you can see under Subsection 3 for that unit because 401 KAR 63:010 does not require testing for fugitive emissions.

34. Comment #(19) Comment 4: We also note that the operating rate of both unit 5 and 6 exceeds the allowable rate indicated on the 1991 construction permit. Please explain.

Response to Comment #(19) Comment 4:

Notice that the construction permit from 1991 referred to is only for Unit 5, the truck dump and conveying. Unit 6, coal unloading, rotary car dumper and shake-out, crushing operations, and conveying is not permitted under C-91-036.

See responses #29 and #30: Response to Comment #19 Comment 1, and Response to Comment #19 Comment 2.

35. Comment #(19) Comment 5: Any information and explanation regarding the above comment could be included in the statement of basis.

Response to Comment #(19) Comment 5:

The Division will include a statement of basis with the proposed permit.

See all responses to Comment #19: Comment 1, Comment 2, Q1, Q2, Comment 3, Comment 4.

36. Comment 20: Units 5 and 6 are required to keep records, however, there does not appear to be a condition indicating how long those records need to be retained/maintained. Please include this requirement for units 5 and 6.

Response to Comment 20:

Please see Section F, condition 2.

**KENTUCKY DIVISION FOR AIR QUALITY'S RESPONSE TO COMMENTS
RECEIVED FROM AMERICAN ELECTRIC POWER ON THE
KENTUCKY POWER BIG SANDY PLANT TITLE V PERMIT**

Certified letter dated July 24, 1997

Unit 1 BSU1 and Unit 2 BSU2 Indirect Heat Exchangers

Continuing Compliance Demonstration Method:

1. Paragraph 1: The Division for Air Quality (Division) acknowledges the comment that compliance with the particulate allowable standard should read compliance with the allowable particulate standard. . .However note the changes documented in the responses to EPA comments.
2. Paragraph 2: The Division concurs that Continuous Opacity Monitoring (COM) as an indicator of compliance with the allowable particulate standard under the compliance demonstration method sections should be deleted from the permit. However, note the additions documented in responses to EPA comments (see especially Division's responses numbered 12 and 15 to EPA comments) and see responses to UIEK comments.

Specific Monitoring Requirements:

3. Paragraph (c): Pursuant to 401 KAR 61:015, Section 6, the Division requires that the rate of fuel burned for each unit shall be measured daily and recorded; the heating value and ash content of fuels shall be ascertained at least once per week and recorded; and the average electrical output and the minimum and maximum hourly generation rate shall be measured and recorded daily. Thus, the Division does not concur with removing this paragraph from the Title V permit. The requirements are from 401 KAR 61:015, Section 6.

Specific Reporting Requirements:

4. Paragraph (a)3: The Division requires maintenance and reporting as specified by the Regulation 401 KAR 61:005, Section 3(16)(c), which requires that a summary of the gaseous measurements shall consist of hourly averages in the units of the applicable standard. The Division does not concur with only excess emission reporting. Reporting should include the requirements of the Big Sandy Title V Permit, Subsection 6 (a)3 for BSU1 and BSU2.

Specific Reporting Requirements:

5. Paragraph (a)4: The Division does not concur with striking out the last sentence of paragraph (a)4, that proof of continuous monitoring system performance is required as specified by the Division whenever system repairs or adjustments have been made. Proof is required, given the regulatory authority of 401 KAR 61:005, Section 3(16)(d).

Unit 2 (BSU2) Indirect Heat Exchanger:

Specific Control Equipment Operating Conditions:

6. The Division response to American Electric Power's request to have low NOx burners deleted from BSU2 Subsection 7 is as follows: the Division understands that the low NOx burners are an integral part of the boiler firing mechanism; therefore, the reference to low NOx burners in Subsection 7 has been deleted.

Unit 5: Truck Dump Unloading and Coal Conveying and Unit 6: Coal Unloading, Crushing, Conveying, and Handling:

Specific Control Equipment Operating Conditions

7. Subsection 7: American Electric Power is recommending removal of the parenthetical statement listing the control equipment. Regulation 401 KAR 50:035, Section 7(5) requires that the permit contain measures to ensure emission limitations and standards are enforceable as a practical matter. Thus, the control equipment used for compliance must be listed with the requirements for operation and maintenance to ensure practical enforceability. Therefore, the Division does not concur with the recommendation to remove the reference to the control equipment from the permit.

Insignificant Activities

8. American Electric Power is requesting addition of another insignificant activity which is general and worded as follows: all other activities individually resulting in emissions less than 10 lbs/day or two tons per year of a regulated air pollutant not specifically listed above. The Division acknowledges that addition of this term could reduce some notifications and permit changes; however, the criteria threshold for which a hazardous air pollutant must not exceed to meet the insignificant activity criteria based on 401 KAR 50:035, Section 5(4)(d) is 0.5 ton per year. American Electric Power's proposal of 10 pounds per day and two tons per year exceeds the cutoff for a hazardous air pollutant emission. Additionally, the condition does not ensure that requirements per 401 KAR 63:020 will be met for a new activity, or that applicable requirements, standards, and regulations will be followed. Therefore, this generalization of activities does not comply with 401 KAR 50:035, Section 5. Thus, the Division does not concur with addition of this term.